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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

SERGEANT GARY A. STEIN,

Plaintiff,

vs.

RAY MABUS, Secretary of the Navy,

Defendant

) Case No.: 12cv0816-H(BGS)

)

) **JOINT MOTION FOR ENLARGEMENT**
) **OF PAGE LIMITATIONS APPLICABLE**
) **TO DEFENDANT'S REPLY IN SUPPORT**
) **OF DEFENDANT'S MOTION TO**
) **DISMISS**

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COME NOW THE PARTIES, Plaintiff Gary A. Stein, by and through his counsel, David Loy, and Defendant Ray Mabus, Secretary of the United States Navy, by and through his counsel, Laura E. Duffy, United States Attorney; Thomas C. Stahl, Assistant United States Attorney, Chief, Civil Division; and Christopher R. Hall and Matthew J.B. Lawrence, Attorneys, United States Department of Justice, Civil Division, Federal Programs Branch, and hereby jointly move the Court for an enlargement of up to three (3) pages of the page limitations applicable to Defendant's reply memorandum in support of Defendant's Motion to Dismiss, up to and including thirteen (13) pages.

As good cause for the enlargement requested, counsel for Defendant have worked diligently to fully and comprehensively address the arguments set forth in Plaintiff's opposition to Defendant's Motion to Dismiss as concisely and efficiently as possible, but have not been able to do so within the page limitations set forth by LCivR 7.1(h). Defendant submits that a modest enlargement of the page limitations would permit Defendant to address all of the issues on the papers to the greatest extent possible, so that the Court can have the benefit of a full written briefing rather than be required to consider certain of Defendant's arguments for the first time at any oral hearing held on Defendant's Motion to Dismiss. To fully and comprehensively address Plaintiff's arguments, Defendant requires as many as three (3) additional pages over the ten (10) pages permitted by LCivR 7.1(h), for a total up to and including thirteen (13) pages.

Respectfully submitted,

FOR DEFENDANT:

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Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures of the United States District Court for the Southern District of California, I certify that the content of this document is acceptable to counsel for the Plaintiff and that I have obtained authorization from David Loy to affix his electronic signature to this document.

DATED: February 4, 2013

/s/ Christopher R. Hall
CHRISTOPHER R. HALL
Senior Counsel
United States Department of Justice
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